

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROOFERS' PENSION FUND, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

JOSEPH C. PAPA and PERRIGO COMPANY
PLC,

Defendants.

Civ. A. No. 2:16-cv-02805 MCA-LDW

CLASS ACTION

STIPULATION AND [PROPOSED] ORDER

Plaintiff Roofers' Pension Fund ("Plaintiff") and Defendants Perrigo Company plc and Joseph Papa ("Defendants"), through their undersigned counsel, hereby agree and stipulate to the following matters:

WHEREAS, the above-captioned action (the "Action") is subject to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4;

WHEREAS, in accordance with the PSLRA, counsel for Plaintiff published notice of the pendency of the Action on May 18, 2016;

WHEREAS, pursuant to Section 21D(a)(3)(A) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(A), as amended by the PSLRA, the deadline for any Class member to move for appointment as Lead Plaintiff was July 18, 2016; and

WHEREAS, several motions for appointment of Lead Plaintiff are currently pending;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their undersigned counsel, as follows:

1. By entering this Stipulation, Defendants expressly preserve, all rights, claims and defenses, including, but not limited to, all defenses relating to jurisdiction, other than a defense as to the timeliness and sufficiency of service of the summons and complaint and the form of the summons. Similarly, by entering into this Stipulation, Plaintiff shall not waive, and expressly preserves all rights, claims and defenses, including, but not limited to, the right to seek to lift the PSLRA's automatic stay of discovery.

2. Defendant Perrigo acknowledges that, on August 15, 2016, it was served with the complaint filed on May 18, 2016 (hereinafter "5/18/2016 Complaint") and the related summons in that action. Defendant Papa acknowledges that, on August 12, 2016, he was served with the 5/18/2016 Complaint and the related summons in that action.

3. The parties stipulate and agree that Defendants are under no current obligation to answer or otherwise respond to the 5/18/2106 Complaint filed in the Action and that Defendants may defer any answer or other response until (i) after an order is entered regarding the Court's appointment of a Lead Plaintiff and approval of Lead Plaintiff's selection of Lead Counsel pursuant to the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B), and (ii) a scheduling order for the filing of a consolidated or amended complaint and Defendants' response thereto is entered by the Court.

4. The parties stipulate and agree that no more than thirty (30) days after the Lead Plaintiff has been appointed and Lead Counsel approved by the Court in accordance with the PSLRA, counsel for Defendants and Lead Counsel shall confer and submit a proposed schedule for the filing of a consolidated or amended complaint and Defendants' response thereto.

Dated: September 1, 2016

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Counsel Defendant for Joseph Papa

SO ORDERED THIS 6 DAY OF Sept, 2016



Hon. Madeline Cox Arleo
United States District Judge